

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Adam Raymond Hunt

Case: 2:23-mj-30063

Assigned To : Unassigned

Assign. Date : 2/13/2023

CMP: SEALED MATTER (MAW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 8, 2023 in the county of Livingston & elsewhere in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

18 U.S.C. §§ 2252A(a)(2) and 2252A(a)(5)(B)

Offense Description

Receipt, distribution, and possession of child pornography

This criminal complaint is based on these facts:

see attached affidavit.

☒ Continued on the attached sheet.

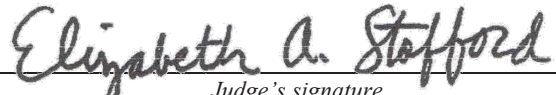
Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: February 13, 2023

City and state: Detroit, Michigan


Complainant's signature

Adam Christensen, Special Agent (FBI)
Printed name and title


Judge's signature

Hon. Elizabeth A. Stafford, United States Magistrate Judge
Printed name and title

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR
A CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Adam Christensen, a Special Agent with the Federal Bureau of Investigation (FBI), being duly sworn, depose and state as follows:

INTRODUCTION

1. I have been employed as a Special Agent of the FBI since 2010 and am currently assigned to the Detroit Division. While employed by the FBI, I have investigated federal criminal violations related to child exploitation, and child pornography. I have gained experience through training and everyday work relating to conducting child exploitation investigations. To date, I have either conducted or participated in over 100 child exploitation investigations.

2. I have received training in the area of child pornography and child exploitation, and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media. Moreover, I am a federal law enforcement officer who is engaged in enforcing criminal laws, including 18 U.S.C. § 2252A. I am authorized by law to request an arrest warrant.

3. This affidavit is submitted in support of an application for a criminal complaint and arrest warrant for Adam Raymond Hunt for violations of 18 U.S.C. §§ 2252A(a)(2) (receipt and distribution of child pornography) and 2252A(a)(5)(B) (possession of child pornography).

4. The statements contained in this affidavit are based in part on information provided by U.S. law enforcement officers, written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents, information gathered from investigative sources of information, and my experience, training and background as a Special Agent.

5. This affidavit is submitted for the limited purpose of securing an arrest warrant. I have not included each and every fact known to me concerning this investigation. Instead, I have set forth only the facts that I believe are necessary to establish probable cause that Hunt has violated 18 U.S.C. §§ 2252A(a)(2) and 2252A(a)(5)(B).

PROBABLE CAUSE

6. On February 8, 2023, an FBI OCE was logged into the smartphone application Kik. The FBI OCE began a conversation with a Kik user with username whynotcowboys with display name hardDad Johnson. The user of whynotcowboys claimed that he had two daughters, ages 11 and 7 years old, and provided a picture of the two of them. The user of whynotcowboys went on to say that “Ive rubbed here and there” followed by “Wife would cut my dick off”. The user of whynotcowboys also claimed that he has “jacked off” to both of them and “licked them both at 3”. He goes on to claim that the oldest daughter is a heavy sleeper and that “Recently; Ive cum on her pussy while she slept”. After the OCE asked if the

user of whynotcowboys had an image of him abusing his daughter, whynotcowboys states, “Only got one; Don’t share please” and then shares an image of a prepubescent minor female displaying her vagina close to the camera with her shirt pulled up her torso. Based on my training and experience this image meets the Federal definition of child pornography. The user of whynotcowboys later in the conversation sent three images of a set of pictures of prepubescent minor females that meet the Federal definition of child pornography and stated that they are of “Random cam girls”.

7. Based on the above information an emergency disclosure request was made to Kik for the subscriber information for the Kik username whynotcowboys. On February 8, 2023, Kik supplied information which showed that a profile picture associated with the account of a white male with a beard that appears to be approximately in his mid-30s. The email address associated with the Kik account was whynotcowboys@*****.com The phone that was used to log into the account was a Samsung model SM-G781V, more commonly known as a Samsung Galaxy S23.

8. A search warrant was authorized in the Eastern District of Michigan and was executed on February 8, 2023 into February 9, 2023, after IP Address information and other information linked Hunt’s residence in Pinckney, Michigan to the distribution of the child pornography. At the residence were two individuals,

a female, and her husband, Adam Raymond Hunt. The two children and bearded man from the images did not live the residence, but are individuals known to and close to Hunt. Hunt acknowledged a Samsung Galaxy S23 as his cellular telephone, the same type of phone that was used to log in to the Kik account whynotcowboys, but after being told that the search warrant was regarding child pornography he invoked his right to counsel.

9. Just prior to the search warrant being executed at the residence at approximately 11:45 pm, the Kik user whynotcowboys sent additional photographs of the individuals he claimed to be himself, his wife, and his children. A search of the phone acknowledged by Hunt as being his, the Samsung Galaxy S23, showed these same photographs on the phone. In addition, a review of the data extracted from this phone showed that Kik had been installed on the phone, that Hunt had used the username whynotcowboys on a website that when visited¹ contained images that meet the Federal definition of child pornography. Evidence of the email address associated with the Kik account, whynotcowboys@*****.com was also found on the Samsung Galaxy S23.

¹ The URL for this website is known to law enforcement but is not being provided in this affidavit to stop the further distribution of child pornography found on the site.

CONCLUSION

10. Based on the foregoing, there is probable cause to believe that Adam Raymond Hunt has distributed child pornography, in violation of Title 18, United States Code, Section 2252A(a)(2), and possessed child pornography, in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

Respectfully submitted,



Adam Christensen, Special Agent
Federal Bureau of Investigation

Sworn to before me and signed in my presence
and/or by reliable electronic means.



HON. ELIZABETH A. STAFFORD
UNITED STATES MAGISTRATE JUDGE

Date: February 13, 2023